

August 6, 2008

Lauren Lien
Jeff Pope
Reports Analysis Division
Federal Election Commission
999 E. Street, NW
Washington, DC 20463

Re: Hillary Clinton for President; FEC ID No. C00431569, May Monthly Report (4/1/08-4/30/08)

Dear Ms. Lien and Mr. Pope,

This is in response to your letter requesting additional information pertaining to the above-listed report of Hillary Clinton for President (the Committee). You have requested additional information on the reattribution, redesignation, or refund of certain contributions that are so marked on this report. The Committee has reviewed the contributions noted by you and is providing the following information. An Amendment is being filed to correct or clarify aggregation, designation, and attribution where needed. The Committee will also provide a response under separate cover with a copy of additional information requested by you that cannot be filed electronically.

For many of the contributions noted by you, the Committee timely refunded or reattributed the excessive portion of the contribution, i.e., within sixty days, and it is so reported on the Committee s May, June or July Monthly Reports on Line 28a or as a memo entry on 17a which have already been filed.

In some cases, the Committee found data entry errors as a part of its review, cure and notification process and made the needed corrections. Please note that the Committee continues to work on review and improving our data entry.

In several additional cases, the Commission has confused different contributors with the same name. Conway, Knight, Palmer and Ramirez are contributions from separate individuals, at different addresses, and with different occupations and employers.

A few contributions noted by you will be disclosed as refunded on the Committee s August Monthly Report. Although the Committee is diligent with regards to our review and of tracking excessive contributions these few contributions were inadvertently overlooked. During the Committee s ongoing effort to correctly and accurately aggregate the contributions made by an individual, occasional data entry errors occur. Upon discovery, the Committee takes immediate action to correct its records and makes every effort to correct the public record.

Please note that the Committee has always intended to fully comply with the sixty day reattribution and redesignation provision. Strict procedures are used by the Committee to ensure that all contributions are handled in a manner in full compliance with this and all other applicable provisions.

In addition you have requested information regarding the Offsets from Interstate Power and Light, Dave Mendoza and Wisconsin State County & Municipal. IP & L is a division of Alliant Energy and the Committee's refund was made by the parent company IP & L. The Committee paid its final invoice 3/9/2008 to Alliant Energy for 1455.71 however this service was terminated and a refund was issued. Mr. Mendoza was a volunteer for whom the Committee purchased a plane ticket on Southwest Airlines 2/18/08 with our American Express paid 2/27/08. After he had used the ticket he was unable to perform any volunteer services and reimbursed the Committee for the ticket. An amendment will be filed to clarify Wisconsin State County & Municipal.

You have also requested additional information on a few donor refunds. Alfaro, M contribution was not reported due to a data error. The refund on 4/28/08 was voided after the report, however it made her contribution not itemize, we will amend to clarify. Sturmer had two contributions for \$200 with different addresses that were not aggregated and thus not reported we will amend to correct. Basanti, Bruce, McLean, Mosai, contributions were itemized and reported, though the Commission may not have located them due to minor discrepancies with the contributors name. Basanti was reported as Barsanti on 1/10/08 and 2/7/08 and McLean as McJean on 3/31/08 The refund for Bruce, Joel was incomplete this refund was for donor Feldman, JB who contributed in 2/08 and 3/08. In the case of Liran Gilboa Mosai, it is simply that his contributions were reported as being from Gilboa Mosai, Liran and the refunds were to Mosai, Liran Gilboa. Amendments will be filed to clarify the refunds to Culha, Dobbs, Kinder, Presley and Scott.

You have asked for additional information on several debts. As the Commission notes in the report instructions debts under 500 and less the 60 days do not need to be reported. All of the debts noted by the Commission, except one, are under the reporting threshold. Once the Committees debt to the vendor exceeds these limits the Committee then includes them as a debt owed. The Committee has already amended its Year End Report to make the correction.

With respect to the final item noted by you, when reimbursements to staff for travel have exceeded \$500, the Committee has, in fact, itemized on its Schedule B the related payments from staff to vendors when such payments have exceeded \$200 for the election cycle. The Committee has reviewed its travel reimbursements and will file an amendment to cover a handful of cases where additional itemization is found to be necessary.

You have also noted that, in some cases, the purposes for the Committee s debts to individuals for travel reimbursements on Schedule D is different from the purposes made for payments to those same individuals on Schedule B. There are two explanations for this. First, the expenditures actually made on Schedule B are, in fact, for different purposes, i.e., different obligations, than the amounts unpaid and owed on Schedule D. However, because it is the same individual who was paid and to whom the debt is owed, the payment is disclosed on Schedule D as a payment this period, even if it was for other purposes. In other words, the Committee may owe a staff member travel reimbursements, which are unpaid and a debt, while at the same time, paying that same person a salary, which is not part of the debt.

Therefore, the purpose of the debt is different than the purpose of the expenditure. The Committees reporting software automatically aggregates these payments for the this period field on Schedule D. However, the Committee is of the understanding that the Commission is requesting that only payments made to reduce the debt portion be included as payments this period and that other payments to the same creditor be excluded. (RAD referred the Committee to the instructions for Schedule D-P, even though the instructions do not indicate that only payments made to reduce debts be included in the this period field.) Although the Committee believes that this is a change from past Commission requirements, it will seek to have its reporting software changed, so that the information may be separated. However, the Committee is not yet aware whether this change to the reporting software may be able to be effectuated.

The second reason that some of the purposes on Schedule D are different than the expenditure purposes on Schedule B is because the Committee more fully itemizes the purposes on Schedule B. Whereas the purpose on Schedule D may indicate travel, the full itemization of the expenditure on Schedule B may indicate travel, per diem, meal expense, and office supplies. This is due to the reporting software that the Committee uses for the debt purposes, which does not easily permit disclosure of multiple purposes on the Schedule D. The Committee will seek a correction to its reporting software and will endeavor to amend to clarify additional purposes on the Schedule D.

I hope this information is sufficient for your review. However, should you desire any additional information, please contact our Counsel, Eric Kleinfeld, at 202-293-1177.

Sincerely,

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ETEXT ATTACHMENT

Shelly Moskwa

Treasurer, Hillary Clinton for President

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